

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA - ATLANTA DIVISION

IN RE:

PAULETTE SOLANGE DJACHECHI,

Debtor.

CASE NO. 17-65583-pwb

CHAPTER: 13

JUDGE: HONORABLE PAUL W.
BONAPFEL

OBJECTION TO CONFIRMATION OF PLAN AND MOTION TO DISMISS CASE

COMES NOW Interstate Intrinsic Value Fund, LLC, (hereinafter known as "Creditor"), a secured creditor holding a Security Deed on real property commonly known as 5126 Stoneywood Circle SE, Mableton GA 30126-1955, and for the reasons stated below, objects to confirmation of the Plan and moves to dismiss this case, as follows:

1. On September 20, 2017 Creditor filed a pre-petition arrearage claim in the amount of \$37,912.97. The plan calls for an estimated pre-petition arrearage amount of \$0.00 and a value of \$0.00 at 9.25% interest. Debtor appears to be disputing the debt and fails to provide for the claim in any way. The plan also lists the incorrect property address. Creditor objects to the lack of treatment of its claim in the plan.

2. Creditor reserves the right to raise the failure of Debtor to have made post-petition payments, if at confirmation that appears to be the case.

WHEREFORE, Creditor prays that the Court deny confirmation of the Plan and moves to dismiss this case. Creditor prays for reasonable attorney's fees and for such other and further relief as is just and equitable.

/s/ Bryce Noel

Bryce Noel, GA Bar #620796

Attorney for Movant

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on the October 17, 2017, I served a copy of OBJECTION TO CONFIRMATION OF PLAN AND MOTION TO DISMISS CASE which was filed in this bankruptcy matter on the October 17, 2017, in the manner indicated:

The following parties have been served via e-mail:

David Visser Houtsma
david@davidhlaw.com

Mary Ida Townson
courtdailysummary@atlch13tt.com

The following parties have been served via U.S. First Class Mail:

Paulette Solange Djachechi
2865 Lenox Rd #308
Atlanta, GA 30324

**I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.**

Dated: October 17, 2017

Signature: /s/Kewanna D. Vergara
Printed Name: KEWANNA D. VERGARA
Address: Aldridge Pite, LLP
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